

THE HONORABLE TIMOTHY W. DORE

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re

JAN MATHIESON,

Debtor.

JAN MATHIESON,

Plaintiff,

vs.

PHH MORTGAGE CORPORATION, a  
corporation; OCWEN LOAN  
SERVICING LLC, a corporation; and  
WESTERN PROGRESSIVE-  
WASHINGTON INC, a corporation,

Defendants.

Chapter 13

Case No.: 17-12265

Adversary No.: 19-01140

DECLARATION OF RYAN S. MOORE  
IN SUPPORT OF PHH MORTGAGE  
CORPORATION'S AND WESTERN  
PROGRESSIVE-WASHINGTON,  
INC.'S SUPPLEMENTAL OPPOSITION  
TO PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION

I, Ryan S. Moore, hereby declare as follows:

1. I am over the age of eighteen (18), competent to testify, and make the following  
statements based on my personal knowledge.

2. I am counsel of record for the Defendants.

3. To the best of my knowledge, a sale of the Property located at 476 Bronson Way  
NE, Renton Washington 98056 (the "Property") is scheduled for February 7, 2020.

DECLARATION OF RYAN S. MOORE  
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HOUSER LLP  
600 University St., Ste. 1708  
Seattle, WA 98101  
PH: (206) 596-7838  
FAX: (206) 596-7839

4. On January 2, 2020, I contacted Plaintiff's counsel to provide an updated payoff quote good through February 1, 2020, to pay off the Loan on the Property prior to the scheduled sale. The payoff quote amount is \$201,291.68. I have attached a redacted version of the payoff quote which I sent to Plaintiff's counsel as Exhibit 1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: January 2, 2020

s/ Ryan S. Moore  
Ryan S. Moore (WSBA # 50098)

1 **CERTIFICATE OF SERVICE**

2 I the undersigned declare as follows: I am over the age of 18 years and am not a party  
3 to this action. On January 2, 2020, I served the foregoing document(s): DECLARATION OF  
4 RYAN S. MOORE IN SUPPORT OF PHH MORTGAGE CORPORATION'S AND  
5 WESTERN PROGRESSIVE-WASHINGTON, INC.'S SUPPLEMENTAL OPPOSITION TO  
6 PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION in the manner described  
7 below:

8 Joy Lee Barnhart  
9 15 S. Grady Way, Ste 535  
10 Renton, WA 98057  
ecf@joybarnhart.com  
11 *Counsel for Plaintiff/Debtor*

☐ U.S. Mail, Postage Prepaid  
☐ UPS Overnight  
☐ UPS 2 Day Shipping  
☒ CM/ECF  
☐ Courier

12 I declare under penalty of perjury under the laws of the United States of America that  
13 the foregoing is true and correct.

14 Dated: January 2, 2020

15 s/ Shawn Williams  
16 Shawn Williams